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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

Cameron Wiegand,

Plaintiff,
vs.

**State Farm Mutual Automobile
Insurance Company;** Messner Reeves
LLP; Steven Knauss; Jose Rivera; Ellen
Stoebling; Does 1 through 10, inclusive
and Roe Corporations 1 through 10,
inclusive,

Defendants.

Case No.: 2:23-cv-01000-CDS-DJA

**Stipulation and Order to Extend
Discovery Deadlines
(Third Request)**

IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto, by
and through their respective counsel of record, that the discovery deadlines in this
case be extended as follows:

A. COMPLETED DISCOVERY

The parties have conducted the following discovery:

1. Plaintiff has served his initial disclosure of witnesses and documents, and
supplements thereto;
2. Defendant has served its initial disclosure of witnesses and documents, and

1 supplements thereto;

2 3. Plaintiff has propounded and answered written discovery requests;

3 4. Defendant has propounded and answered written discovery requests.

4
5 **B. OUTSTANDING DISCOVERY**

6 1. Disclosure of expert witnesses;

7 2. Depositions of the parties;

8 3. Depositions of fact witnesses;

9 4. Depositions of treating physicians;

10 5. Depositions of expert witnesses;

11 6. Additional written discovery;

12 7. Disclosure of additional documents.

13
14 **C. GOOD CAUSE EXISTS FOR AN EXTENSION**

15 Counsel for the parties have been diligent in conducting discovery but need
16 additional time to depose witnesses and gather documents. In order to produce
17 certain documents requested by Plaintiff, Defendant asserts that a protective order
18 is required. The protected documents are important for depositions and for the
19 experts in this matter.

20 The parties have been working towards an agreement on a protective order in
21 another case, Case 2:23-cv-00520-JAD-DJA *Tefft et al v. State Farm Mutual Automobile*
22 *Insurance Company*. The parties have agreed to use the same protective order
23 established in *Tefft* in this case, to avoid repetitive filings and conserve resources. The
24 protective order in *Tefft* is due to be set in place in mid-July, pursuant to the Court's
25 recent order in that case, and the parties expect to submit the same order in this
26 matter shortly after. Therefore, there is good cause to extend the discovery deadline
27 as requested.

D. PROPOSED EXTENDED DEADLINES

The parties have agreed to extend the discovery deadlines in this case as follows:

	CURRENT DEADLINE	PROPOSED DEADLINE
Motions to amend or add parties	Closed	Closed
Initial expert disclosures	July 12, 2024	October 11, 2024
Rebuttal expert disclosures	August 13, 2024	November 12, 2024
Close of Discovery	September 10, 2024	December 10, 2024
Dispositive motions	October 11, 2024	January 10, 2025
Pretrial Order	November 11, 2024	February 10, 2025, or, if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.

Dated this 14th day of June, 2024.

H&P LAW

/s/ Cara Xidis

Marjorie Hauf, Esq.
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Cara Xidis, Esq.
Nevada Bar No.: 11743
Attorney for Plaintiff

DATED this 14th day of June, 2024.

LEWIS BRISBOIS BISGAARD & SMITH

/s/ Frank Toddre II

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Attorney for Defendant

ORDER

IT IS SO ORDERED.

DATED this 18th day of June, 2024.

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE